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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 MIROSLAV KEFURT, derivatively on behalf) Case No.: 2:22-cv-01774-JAD-BNW
16 of BREMACH, INC., a Nevada corporation,)
17 Plaintiff,)
18 vs.)
19 REINIER “RAY” HOOGENRAAD, an)
20 individual, BENJAMIN “BEN”)
21 MONTGOMERY, an individual,)
22 Defendants.)
23 BREMACH, INC., a Nevada corporation.)
24 Nominal Defendant)

25 **FIRST STIPULATION AND ORDER**
26 **TO CONTINUE DISCOVERY**
27 **DEADLINES AND TRIAL**

28 Plaintiff MIROSLAV KEFURT (“Plaintiff”), by and through his counsel Leah Martin
29 Law, REINIER “RAY” HOOGENRAAD (“Defendant RH”), and BENJAMIN “BEN”
30 MONTGOMERY (“Defendant BM”) (together the “Defendants”) (collectively the “Parties”),
31 hereby stipulate and agree to extend the discovery deadlines ninety days and trial as set forth
32 herein. This is the first stipulation for extension of discovery.

33 **I. DISCOVERY COMPLETED**

34 1. The Plaintiff has submitted initial documents and witnesses;
35 2. Plaintiff propounded his first set of written discovery on Defendant RH;

36 *///*

1 **II. DISCOVERY THAT REMAINS TO BE COMPLETED**

2 3. Plaintiff to serve its first set of written discovery on Defendant BM;
 3 4. Defendants to submit their initial documents and witnesses;
 4 5. Depositions of the Parties, experts and third-party witnesses;
 5 6. Disclosure of expert witnesses;
 6 7. Disclosure of rebuttal expert witnesses;
 7 8. Any additional supplemental written discovery that may be needed;
 8 9. Any other discovery which may be determined as relevant and necessary by the
 9 Parties.

10 **III. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN THE**
 11 **CURRENT DEADLINES**

12 The Plaintiff has been actively participating in discovery but requires additional time
 13 to complete discovery. The Defendants are exploring retention of counsel. This stipulation is
 14 not submitted for any improper purpose or to unnecessarily delay the proceedings. The Parties
 15 submit that good cause exists to grant the stipulated ninety-day extension of the discovery
 16 deadlines and trial for the following reasons: Defendant RH has not completed disclosures or
 17 filed any responses to Plaintiff's written discovery. Defendant BM has not filed an answer to
 18 Plaintiff's complaint, disclosures, and Plaintiff has not had an opportunity to conduct
 19 discovery relating to Defendant BM. Finally, Defendants are *pro se* and special care must be
 20 taken.

21 **IV. PROPOSED EXTENDED DEADLINES**

22 Deadline	23 Current Deadline	24 Proposed
23 Amend Pleadings/Add Parties	24 May 3, 2023	25 Aug 1, 2023
24 Initial Experts	25 Jun 5, 2023	26 Sep 3, 2023
25 Designation of Rebuttal Experts	26 Jul 6, 2023	27 Oct 4, 2023
26 Close of Discovery	27 Aug 3, 2023	28 Nov 1, 2023
27 Dispositive Motions	28 Sep 4, 2023	29 Dec 3, 2023

1 Joint Pre-Trial Order Oct 5, 2023 **Jan 3, 2024**

2 **V. THIS EXTENSION WILL AFFECT THE TRIAL DATE**

3 The requested extension would affect the trial date. The Parties respectfully request
4 that the trial date be rescheduled to the Court's next available trial date.

5 **VI. CONCLUSION**

6 Based upon the foregoing, the Parties respectfully request and submit that good cause
7 exists, and for the Court to adopt the forgoing deadlines and reschedule trial in this case.

8
9 Dated this 18 day of July 2023

Dated this 17th day of July 2023

10
11 /s/ Leah Martin

12 Leah Martin, Esq.
13 Kevin Hejmanowski, Esq.
14 Nevada Bar No. 10612
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Defendant in Pro Se

16
17 Dated this 18 th day of July, 2023

18
19 RHoogenraad
20 Reinier Hoogenraad
21 211 North Star Lane
22 Newport Beach, CA 92660
23 *Defendant In Pro Se*

24 **ORDER**
25 **IT IS SO ORDERED**

26 **DATED: 9:17 am, July 19, 2023**

27
Brenda Weksler
BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE